

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

Morton S. Bouchard, III, Individually and as)	
Co-Trustee for the Morton S. Bouchard III)	
2017 Family Trust,)	
)	Case No. 4:24-cv-00693
Plaintiffs,)	
)	Related Case: 4:23-cv-3729
v.)	
)	
David R. Jones, Elizabeth Carol Freeman,)	
Jackson Walker, LLP, Kirkland & Ellis, LLP,)	
Kirkland & Ellis International, LLP, Portage)	
Point Partners, LLC, and Matthew Ray,)	
)	
Defendants.)	

**DEFENDANTS KIRKLAND & ELLIS LLP AND KIRKLAND & ELLIS
INTERNATIONAL LLP'S NOTICE OF RELATED CASE**

Defendants Kirkland & Ellis LLP and Kirkland & Ellis International LLP ("Kirkland") give notice pursuant to LR 5.2 that the above-captioned case is related to the following case pending in the Southern District of Texas:

Michael D. Van Deelen

v.

David R. Jones, Elizabeth Carol Freeman, Jackson Walker, LLP,
Kirkland & Ellis, LLP, and Kirkland & Ellis International, LLP

Case No. 4:23-cv-3729, filed October 4, 2023

Kirkland believes these cases are related because: (1) they involve common events and occurrences—namely, allegations of an intimate relationship between former Chief Judge of the Bankruptcy Court for the Southern District of Texas, David R. Jones, and law firm partner Elizabeth Freeman of Jackson Walker LLP and an alleged conspiracy between Jones, Freeman, Jackson Walker, and Kirkland to exploit that alleged relationship; (2) they share common parties, in that Jones, Freeman, Jackson Walker, and Kirkland are defendants in both cases; and (3) they involve common legal issues,

including but not limited to the application of Bankruptcy Rule 2014 and the Racketeer Influenced and Corrupt Organizations Act.

DATED: April 8, 2024

Respectfully submitted:

/s/ John Hueston

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CERTIFICATE OF SERVICE

I hereby certify that, on April 8, 2024, a true and correct copy of this document was served on the following counsel of record via the Court's CM/ECF system and by e-mail in compliance with the Federal Rules of Civil Procedure and Southern District of Texas Local Rule 5.3:

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By: /s/ Sonia Gaeta
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